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7 ZAMPERINI AIRFIELD PRESERVATION SOCIETY

8
9 **UNITED STATES DISTRICT COURT**
10
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 ZAMPERINI AIRFIELD
13 PRESERVATION SOCIETY, a
14 California unincorporated association,
15 Plaintiff/Petitioner,

16 v.

17 CITY OF TORRANCE, a California
18 municipal corporation and ROES 1
through 100,

Defendants/Respondents.

CASE NO.: 2:24-cv-4538-CBM-JPR
[Assigned to Magistrate Judge Consuelo
B. Marshall]

REQUEST TO ENTER DEFAULT

Petition Filed: April 22, 2024

19 **TO THE CLERK OF THE ABOVE-ENTITLED COURT**

20 Plaintiff and petitioner Zamperini Airfield Preservation Society (“Plaintiff”)
21 hereby requests under Federal Rules of Civil Procedure, Rule 55(a) that the Clerk of
22 the above-entitled Court enter default in this matter against defendant and respondent
23 City of Torrance (“Defendant”) on the ground that Defendant has failed to appear or
24 otherwise respond to the complaint within the time prescribed by the Federal Rules of
25 Civil Procedure. Plaintiff served the Verified Petition for Writs of Administrative
26 Mandamus and Traditional Mandate on Defendant on May 7, 2024. Plaintiff’s
27 response was due on June 7, 2024.

The above stated facts are set forth in the accompanying declaration of Declaration of Christopher M. Wolcott, filed herewith.

DATED: November 8, 2024 ORBACH HUFF & HENDERSON LLP

By: /s/ Christopher Wolcott

Stan M. Barankiewicz II

Christopher M. Wolcott

Attorneys for Plaintiff/Petitioner

ZAMPÉRINI AIRFIELD PRESERVATION SOCIETY

ORBACH HUFF & HENDERSON LLP

CERTIFICATE OF SERVICE

I certify that counsel of record who are deemed to have consented to electronic service are being served on November 8, 2024 with a copy of this document via the court's CM/ECF system pursuant to Local Rule 5-3.2.1.

/s/ Christopher M. Wolcott
Christopher M. Wolcott, Esq.